

EXHIBIT

A

1 this form is from?

2 A. Grantsville.

3 Q. Okay. And the next one, Exhibit 7, what
4 location is that one from?

5 A. Ocala.

6 Q. And on page 424, is that the FCRA
7 disclosure/consent form that was used for Ocala in the
8 time period 2004 to 2008?

9 A. It has a revision date in 2006. So this
10 would not cover the whole period.

11 Q. 2006 means when it began?

12 A. Yes.

13 Q. Okay. And do you recall what type of form
14 was used before then?

15 A. I believe the content was the same.

16 Q. Okay. And Exhibit --

17 MR. PIETZ: I'm sorry, what are we on?

18 Q. Exhibit 8, can you tell me where that
19 particular form file is from?

20 A. Chino.

21 Q. And I guess this doesn't have a Bates number
22 on it, but do you see what we're calling here the FCRA
23 disclosure/consent form in this packet?

24 A. This one?

25 Q. Yes. And that's where it says at the top

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1 "Do+Able Products California Authorization for Release
2 of Information for Employment Purposes"?

3 A. Yes.

4 Q. And is this the FCRA disclosure form that was
5 being used in the Chino location 2004 to 2008?

6 MR. KONTUL: If you know.

7 A. I don't know if it was for the whole time.

8 Q. But do you know if it was being used then, in
9 that time period?

10 A. At one point, obviously.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

9 Q. And ClosetMaid, just for the record,
10 ClosetMaid is a subsidiary of Emerson?

11 MR. KONTUL: I'm going to object as to -- go
12 ahead and answer.

13 A. They're a wholly owned subsidiary, correct.

14 Q. Okay. Now having looked at these forms now,
15 and going back to my earlier question, what was the
16 change that was made? Can you identify that change?

17 A. There were several forms so each one would
18 have a unique change.

19 Q. This form as of '07-'09, is that being used
20 throughout the five locations?

21 A. Currently?

22 Q. Currently.

23 A. Yes.

24 Q. And when it was put in place it became the
25 form for all the locations?

1 A. Correct.

2 Q. Okay. In looking at then -- let's look at
3 Exhibit 8 and specifically the FCRA authorization form
4 there. Now looking at this form in Exhibit 8, do you
5 see there's a paragraph in there beginning with, "I
6 hereby release ClosetMaid and its agents," and it goes
7 on? Do you see that? It's the one, two -- it's the
8 fourth paragraph down.

9 A. It says, "I hereby release Do+Able Products."

10 Q. No, I'm looking at what I thought was Exhibit
11 8. The Ocala location.

12 A. Oh.

13 Q. Is that Exhibit 8?

14 A. No, sir. It's Exhibit 7.

15 Q. Okay. My fault. I'm mismarking my exhibits.

16 Okay. Looking at that, would you agree with
17 me that that paragraph that begins "I hereby release
18 ClosetMaid, and its agents, officials," and it goes on,
19 that paragraph has been taken out in the '07-'09 form;
20 is that right?

21 MR. KONTUL: I just want to be clear. You're
22 asking if the paragraph that reads, that begins "I
23 hereby release ClosetMaid" on document labeled 424 --

24 MR. PIETZ: Right.

25 MR. KONTUL: -- which is Boring Exhibit 7,